

Clear Choices in Communications

## February 21, 2008

To:

Commission's Secretary

Marlene H. Dortch Office of the Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

Cc:

Federal Communications Commission

Enforcement Bureau

Telecommunications Consumer Divisions

445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Cc:

Best Copy and printing, Inc.

445 12<sup>th</sup> Street Suite CY-B402 Washington, DC 20554

Re:

Annual 64.2009 (e) CPNI Certification for 2007

EB Docket No. 06-36

Company Name	State	Filer ID#	OCN#
Saco River Telegraph & Telephone Co.	ME	801624	0022
The Pine Tree Telephone & Telegraph Co.	ME	801213	0020
Communications Design Acquisition Corp.	ME	821658	3709
CRC Communications of Maine, Inc.	ME	821954	1255
The Granby Telephone & Telegraph Co. of MA, Inc.	MA	805674	0036
War Acquisition Corporation	WV	805872	0258

I, Ed Tisdale, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seg.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint,e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

[Signature of Authorized Representative]

Ed Tisdale

[Printed Name of Authorized Representative]

Date:

Vice President

[Title of Authorized Representative]



## Customer Proprietary Network Information Statement of Corporate Policy (excerpt)

Pine Tree Networks is committed to honoring the privacy and security of our customer's personal information. We have adopted the protective policies, procedures and enforcement actions described in this manual to protect the privacy of CPNI in accordance with § 222 of the Telecommunications Act of 1996, 47 CFR 64.2001-2009 and The FCC's regulations, 47 CFR 64.2009. The company's policy applies to all employees of Pine Tree Networks and its subsidiaries. Any violation of this policy will subject the employee to the Discipline Policy up to and including immediate discharge. Any employee having knowledge of any violation of the CPNI policy shall promptly report such violation to the appropriate level of management. Senior management (Director Level) of Pine Tree Networks is responsible for compliance in their area of responsibility.

Pine Tree Networks' CPNI policies address FCC rules by:

- Keeping records of customer permission to use account information for marketing purposes. (notes on accounts)
- Monitoring and recording events in which customer information was disclosed to third parties.
- Providing ongoing training for employees in the appropriate use of customer information.
- Reviewing marketing efforts to ensure privacy requirements.
- Preparing and making publicly available annual certificates that the company has established operating procedures to comply with FCC rules.
- Informing the FCC of any actions taken against pre-texters/data brokers.
- Providing a summary of the customer complaints about unauthorized disclosure of customer information annually.

The duty to protect and ensure the security of Pine Tree Networks customer's CPNI falls in accordance with the Corporate policies and practices for Confidentiality described in our Employee Handbook and signed by every employee in the "Confidentiality Statement."